## REMARKS

Claims 1-8, 10-20 and 22-46 are pending in the application prior to entering this amendment.

The examiner objects to claims 40 and 42 for informalities.

The examiner rejects claims 1-8, 10-20, and 22-45 under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement. The examiner rejects claims 40 and 41 under 35 U.S.C. § 112, first paragraph, as failing to comply with the enablement requirement.

The examiner rejects 1-7, 13-16, 19, 24-32, and 38-46 under 35 U.S.C. § 102(b) as anticipated by or, in the alternative, under 35 U.S.C. § 103(a) as unpatentable over Virtual Network Computing ("VNC"). The examiner rejects claims 8-9, 20-21, and 34-35 under 35 U.S.C. § 103(a) as unpatentable over VNC in view of Mairs et al. (U.S. patent no. 5,864,711). The examiner rejects claims 9, 21, and 35 under 35 U.S.C. § 103(a) as unpatentable over VNC in view of Aharoni et al. (U.S. patent no. 6,014,694). The examiner rejects claims 10, 22, and 36 under 35 U.S.C. § 103(a) as unpatentable over VNC in view of Mairs and further in view of Tsai et al. (U.S. patent no. 5,818,877). The examiner rejects claims 11, 23, and 37 under 35 U.S.C. § 103(a) as unpatentable over VNC in view of Mairs and Tsai and further in view of Gill et al. (U.S. patent no. 6,259,810). The examiner rejects claims 12 and 33 under 35 U.S.C. § 103(a) as unpatentable over VNC in view of Yanagihara et al. (U.S. patent no. 5,742,728). The examiner rejects claim 15 under 35 U.S.C. § 103(a) as unpatentable over Lakritz. (This last rejection is a clerical error by the examiner as we explain in more detail below.).

The applicant amends claims 1-4, 10, 11, 15, 18, 22-24, 29, 40-43, and 46 and cancels claims 16 and 17 without prejudice. The applicant previously canceled claims 9 and 21.

Claims 1-8, 10-15, 18-20, and 22-46 remain in the case after entering this amendment.

The applicant adds no new matter and requests reconsideration.

### *Response to Arguments*

The applicant amends independent claims 1, 15, 24, and 46 to overcome their respective rejections, as explained below. These amendments also address the examiner's concerns that the data server has no functional relationship with any other element recited in the claims. The claims now provide more clearly described functional relationships with both the server and the

client. For example, claim 1 now recites a *data server responsive to commands from the client station, coupled to the server through a second communication link.*

### Claim Objections

The examiner confirmed during a telephone call on April 12, 2006 that his objections to claims 40 and 42 are in error, and the objection is instead to claims 41 and 43. The applicant amends claims 41 and 43 to overcome the examiner's objections.

### Claim Rejections Under § 112

The examiner rejects claims 1-8, 10-20, and 22-45 because they fail to comply with the written description requirement. The examiner rejects claims 40 and 42 because they fail to comply with the enablement requirement.

The applicant amends claims 1, 15, and 24 to replace "scan line" with —row— to obviate the examiner's rejection. The specification supports this amendment at various portions, including page 16, lines 3-6.

The applicant amends claims 40 and 42 to more clearly define the server, including adding that the server is adapted to store the user data from the previous frame to compare with the user data from the current frame to produce a coded difference, and to send the coded difference to the client station. The added limitations to claims 40 and 42 enable the temporal compressor and server to identify and locate a previous frame contained within the cache of the client. In stark contrast to the examiner's allegations, the XOR operation can be performed because the temporal compressor has access to the user data of the previous frame.
The specification supports this amendment in various portions, including at page 12, lines 11-16.

These amendments overcome the examiner's § 112 rejections of claims 1-8, 10-20, and 22-45.

### Claim Rejections Under §§ 102 and 103

The examiner rejects claims 1-7, 13-16, 19, 24-32, and 38-46 as old or obvious over VNC in view of various combinations of Mairs, Aharoni, Tsai, Gill, and Yanagihara.

The applicant traverses the examiner's rejections for the reasons that follow.

The applicant amends independent claims 1, 15, and 46 to recite limitations that are neither anticipated nor obviated by VNC either by itself or in combination with any other reference of record.

Amended claim 1 recites *a data server responsive to commands from the client station, coupled to the server through a second communication link, the server and the data server communicating using a communication protocol other than the remote desktop communication protocol used by the server and the client station.* Claim 15 includes a similar limitation. Claim 24 recites *establishing a first communication link between the server and the data server that uses a first communication protocol to supply multimedia data* and *transmitting the difference table to the thin client using a second communication link distinct from the first communication link that uses a second communication protocol different than the first communication protocol.* Claim 46 recites *a data server, responsive to commands from the client station, distinct from the client station, coupled to the server through a second communication link, the server and the data server communicating by using a communication protocol other than a remote desktop communication protocol used by the server and the client station.*

VNC does not disclose such a recited data server. The examiner deemed moot arguments relating to the patentability of claims 1 and 15 because the data server was not a recited element. The applicant now amends claims 1 and 15 to include the previously erroneously excluded data server. In addressing the data server recited in claim 46, the examiner notes that the claim 46 "simply recites that the server and data server communicate over a different communication protocol than the remote desktop communication protocol." The examiner interprets the limitation as "any of the number of known communication protocols and/or to the data server and the server." The applicants contend that it is not necessary to specifically identify what data is being communicated between the data server and the server. And claim 46 recites a data server that is distinct from and operates responsive to commands from the client station (providing a structural relationship with the client station). Claim 46 requires not that the data server and the server communicate in "any number of known communication protocols" as the examiner alleges, but that they communicate through a second communication link using a protocol *other than* (i.e., different or distinct) from the remote desktop communication protocol used between the server and the thin client through the first communication link.

Even if the applicant agrees with the examiner's assertion that the VNC teaches that the protocol may have more than one type of transport —the applicant does not so agree—, the VNC fails to disclose the existence of two different protocols operating in the same system using two distinct communication links as is required by the claim. None of the other cited references alleviate the deficiency.

Relative to claim 3, the examiner notes that the claim fails to specify how the data server is functionally inter-related to other elements. Since the applicant has incorporated limitations similar to those from original claims 2 and 3 into claim 1, it amends claim 1 to provide such an interrelationship to obviate the examiner's objection. The applicant asks the examiner to give the data server its due weight.

Claim 11 recites *where if a last number of a row in the difference map to be run length encoded is a zero, for the last number pair in the difference table, a first number of the last number pair indicates one less than the number of zeros in a current run.* Claims 23 and 37 include a similar limitation. The examiner acknowledges that the VNC, Mairs, and Tsai do not disclose this limitation but argues that Gill provides the missing link. But Gill discloses at column 10, lines 42-46, that "once the last column of any row is detected by step 142, transparent pixels from the end of a row are removed and the length counter 77 reduced for that row a corresponding amount (to zero if the entire row is transparent)." Gill appears to disclose truncation, or shortening, of the row if zeroes are present at its end. Gill does not disclose coding to deal with the presence of zeroes as recited. As the applicant notes above, claims 11, 23, and 37, recites a specific coding where a first number of a last number pair indicates one less than the number of zeros in a current run.
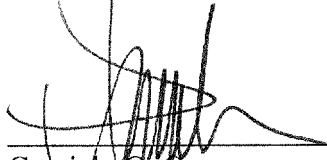
The applicant requests the examiner allow independent claims 1, 15, 24, and 46. Since claims 2-8, 10-14 depend from claim 1, claims 40-41 depend from claim 15, and claims 18-20, 22-23, and 42-43 depend from claim 24, the applicant requests the examiner allow these claims as well.

## Conclusion

For the foregoing reasons, the applicant requests reconsideration and allowance of all remaining claims. The applicant encourages the examiner to telephone the undersigned at (503) 222-3613 if it appears that an interview would be helpful in advancing the case.

Respectfully submitted,

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